

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO

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THE PRIVATEBANK AND TRUST COMPANY, as)
Administrative Agent,)

Plaintiff,)

v.)

Case No.

1:15MC 18

GLOBAL STORAGE SOLUTIONS, LLC (F/K/A/
BELL VENTURES, LLC), ALL STATE TANK
MANUFACTURING, L.L.C., USA TANK SALES
& ERECTION COMPANY INC., M & W TANK
CONSTRUCTION CO., C&C TANK ERECTORS
LLC, TOTAL TANKS, LLC, and TANK
HOLDINGS, INC.)

Defendants.)

JUDGE BOYKO

NOTICE OF FILING OF MISCELLANEOUS ACTION PER 28 U.S.C. §754

Tank Operations, LLC ("Tank"), not in its corporate capacity, but solely as court-appointed receiver in that certain action entitled The PrivateBank and Trust Company, as Administrative Agent v. Global Storage Solutions, LLC (F/K/A Bell Ventures, LLC), et al., currently pending in the United States District Court for the Northern District of Illinois under case number 15-cv-01600, hereby files this Notice of Filing Miscellaneous Action Pursuant to 28 U.S.C. §754 and respectfully states as follows:

1. On February 20, 2015, The PrivateBank and Trust Company ("PrivateBank" or ("Plaintiff") filed its Complaint against Global Storage Solutions, LLC (F/K/A/ Bell Ventures, LLC) ("Global Storage"), All State Tank Manufacturing, L.L.C. ("All State"), USA Tank Sales & Erection Company Inc. ("USA Tank"), M & W Tank Construction Co. ("M & W"), Total Tanks, LLC ("Total Tanks"), C&C Tank Erectors LLC ("C&C"), and Tank Holdings, Inc.

Receipt # 54660005413
\$46.00 paid 3/4/15 AKA

("Tank Holdings") (collectively, the "Defendants") in the U.S. District Court for the Northern District of Illinois, Eastern Division, Civil Action No. 1:15-cv-01600 (the "Lawsuit"). A true and correct copy of the Complaint is attached hereto as Exhibit A.

2. In the Lawsuit, on February 20, 2015, the Plaintiff filed their Emergency Motion for Appointment of a Receiver for Defendants.

3. On February 24, 2015, the Court in the Lawsuit issued an order appointing Tank Operations, LLC as receiver over Defendants (the "Receiver"). A true and correct copy of the Order Appointing Receiver is attached hereto as Exhibit B.

4. Upon information and belief, property subject to the Order Appointing Receiver resides in this judicial district. Thus, pursuant to 28 U.S.C. §754, the Receiver now files the Complaint and Order Appointing Receiver in this judicial district.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests that this Court grant him all relief at law or in equity to which he shows himself to be justly entitled.

Dated: March 3, 2015

Respectfully Submitted,

Tank Operations, LLC, not in its corporate capacity, but solely as court appointed receiver in that certain action entitled The PrivateBank and Trust Company, as Administrative Agent v. Global Storage Solutions, LLC (F/K/A Bell Ventures, LLC), et al., currently pending in the United States District Court for the Northern District of Illinois under case number 15-cv-01600

By: 

One of Its Attorneys

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